

1 JOY D. LLAGUNO (CA Bar No. 311867)  
2 **HOOK & HOOK PLLC**  
3 8383 Wilshire Blvd., Suite 935  
Beverly Hills, CA 90211  
4 Phone: 724-802-7144  
Fax: 724-802-7959  
Email: [jllaguno@hooklaw.com](mailto:jllaguno@hooklaw.com)

5  
6 BRIAN D. WALLER (admitted *pro hac vice*)  
**PECKER & ABRAMSON, P.C.**  
7 1325 Avenue of the Americas, 10<sup>th</sup> Floor  
New York, NY 10019  
Phone: 212-382-0909  
8 Email: [BWaller@pecklaw.com](mailto:BWaller@pecklaw.com)

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10 *Attorneys for Plaintiff Stephen Russell*

11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13 SAN FRANCISCO DIVISION

14  
15 STEPHEN RUSSELL,

16 Plaintiff,

17 v.

18 NIR MAMAN, et al.,

19 Defendants.

20  
21 AND RELATED THIRD PARTY CLAIMS,  
CROSSCLAIMS, AND COUNTERCLAIMS.  
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CASE NO. 18-CV-06691-RS

**ORDER**

**JOINT STIPULATION RE ADR AND CASE  
SCHEDULE PURSUANT TO THE  
COURT'S JULY 29, 2021 ORDER  
AS MODIFIED BY THE COURT**

Dept.: Courtroom 3, 17<sup>th</sup> Floor  
Judge: Hon. Richard Seeborg

1 Pursuant to the Court's July 29, 2021 Order directing all Parties to meet and confer regarding  
 2 scheduling deadlines and potential ADR (Dkt. 239), Plaintiff Stephen Russell ("Plaintiff"),  
 3 Defendants Nir Maman, Ryan Micheletti, George Akkelquist, Legion Industries, Inc. d/b/a Shield  
 4 Corps Security, DFW Metroplex Training Academy, and CT707 Israeli Krav Systems, Inc.  
 5 ("Defendants"), and Third-Party Defendants Ronen Shlomo and Bsecure, (collectively, "the Parties"),  
 6 by and through the undersigned counsel, jointly stipulate as follows:  
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8 WHEREAS, on July 29, 2021, after a videoconference with the Parties, the Court entered an  
 9 Order directing the Parties to meet and confer to discuss ADR possibilities and scheduling deadlines  
 10 (Dkt. 239);

11 WHEREAS, on August 4, 2021, counsel for all Parties participated in a meet and confer  
 12 conference pursuant to the Court's July 29, 2021 Order;

13 WHEREAS, counsel for all Parties have agreed to circulate a list of proposed private  
 14 mediators and confer with their respective clients as to accepting or rejecting private mediation, and  
 15 further agreed that should the Parties decide that the advice of Magistrate Judge Kim would be helpful  
 16 in settlement, the Parties will inform the Court;

17 WHEREAS, the continued deposition of Defendant Nir Maman and the Rule 30(b)(6)  
 18 deposition of CT707 Israeli Krav Systems, Inc. ("CT707") is scheduled for August 17, 2021, and  
 19 counsel for Ryan Micheletti anticipate compelling non-party Tara Walsh to appear for deposition;

20 WHEREAS, if the depositions of Nir Maman, CT 707, and Tara Walsh are completed prior  
 21 to the proposed close of discovery, counsel for all Parties have agreed to the below proposed case  
 22 schedule, and subject to Court approval, request that the case schedule be amended as follows:

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Event	Current Deadline	Deadline
Close of Fact Discovery	September 2, 2021	November 2, 2021
Deadline for Defendants and Third Party Defendants to Designate Experts	August 1, 2021	December 2, 2021
Deadline to Designate Supplemental and Rebuttal Experts	August 1, 2021	January 4, 2021
Close of Expert Discovery	August 16, 2021	January 18, 2022
Deadline for Court to Hear Dispositive Motions	October 7, 2021	February 3, 2022
Pretrial Conference	December 1, 2021	April 6, 2022
Jury Trial	December 13, 2021	April 18, 2022

Dated: August 6, 2021

Respectfully submitted,

**HOOK & HOOK, PLLC**

*/s/ Joy D. Llaguno*

JOY D. LLAGUNO

**PECKER & ABRAMSON, P.C.**

*/s/ Brian D. Waller*

BRIAN D. WALLER

*Attorneys for Plaintiff Stephen Russell*

**LAW OFFICES OF YOHAN LEE**

*/s/ Chong Roh*

JAKE JUNG  
CHONG ROH

*Attorneys for Defendants Nir Maman and CT707 Israeli Krav Systems, Inc.*

1                   **LAW OFFICES OF DEK KETCHUM**

2                   */s/ Dek Ketchum* \_\_\_\_\_

3                   DEK KETCHUM

4                   JENNY D. SMITH

5                   *Attorneys for Defendants George Akkelquist and*  
6                   *DFW Metroplex Training Academy*

7                   **RESNICK LOUIS, P.C.**

8                   */s/ Robert A. Hufnagel* \_\_\_\_\_

9                   SHARI DANA GOGGIN

10                  ROBERT A. HUFNAGEL

11                  *Attorneys for Defendants Legion Industries, Inc.,*  
12                  *Ryan Micheletti, and Shield Corps Security*

13                  **LEWIS BRISBOIS BISGAARD & SMITH**

14                  */s/ Kendall A. Layne* \_\_\_\_\_

15                  ALEXANDER A. GRAFT

16                  KENDALL A. LAYNE

17                  *Attorneys for Bsecure and Ronen Shlomo*

18                  **ORDER**

19                  Pursuant to stipulation and for good cause shown, IT IS SO ORDERED that the case  
20                  schedule shall be amended as proposed.

21                  DATED: August 6, 2021



22                  Honorable Richard Seeborg  
23                  United States District Judge